

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

IN RE: Walter Morales and Blanca Morales
Debtors

CHAPTER 13
CASE NO. 09-13429-ANV

OBJECTION TO DEBTORS' SECOND AMENDED CHAPTER 13 PLAN AND MOTION TO
MODIFY SECURED CLAIM

Now Comes Litton Loan Servicing, L.P. as servicer for Mortgage Electronic Registration Systems, Inc. as Nominee for HSBC Bank USA, National Association, As Trustee Under the Pooling and Servicing Agreement Dated as of May 1, 2005, Fremont Home Loan Trust 2005-B ("Litton") and files its objection to the Debtors' Second Amended Chapter 13 Plan filed on March 11, 2010 and Motion to Modify Secured Claim. In support of its objection, Litton states as follows:

1. Litton, is the servicer for the holder of the first mortgage on the debtors' property located at 37 McMillien Street, Providence, RI 02904.
2. The debtors' Second Amended Chapter 13 Plan attempts to modify this secured claim by reducing the bifurcating the claim into a secured claim of \$135,000.00 and treating the remaining balance as an unsecured claim.
3. Litton objects to the proposed treatment of its claim and states it values the property at \$150,000.00. (Appraisal attached).

WHEREFORE, Litton Loan Servicing, L.P. respectfully requests that the Court deny confirmation of the debtors' Second Amended Chapter 13 Plan and deny debtor's Motion to Modify Secured Claim or for such other relief as the Court deems just and proper.

Respectfully submitted,

Litton Loan Servicing, L.P.
/s/ Elizabeth A. Lonardo
Elizabeth A. Lonardo, Esquire
RI #7714
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Dated: April 1, 2010

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CERTIFICATE OF SERVICE

I, Elizabeth A. Lonardo, Esquire, state that on April 1, 2010, I electronically filed the foregoing Objection to Debtors' Second Amended Chapter 13 Plan with the United States Bankruptcy Court for the District of Rhode Island using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

Gary L. Donahue, Esquire Assistant U.S. Trustee
John Boyajian, Esquire, Chapter 13 Trustee
John B. Ennis, Esquire for Debtor

I certify that I have mailed by first class mail, postage prepaid the documents electronically filed with the Court on the following non CM/ECF participants:

/s/Elizabeth A. Lonardo
Elizabeth A. Lonardo, Esquire
RI #7714

Blanca Morales
37 McMillen Street
Providence, RI 02904

Walter Morales
37 McMillen Street
Providence, RI 02904